

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:)	
)	
Michael A. Wolf,)	
)	
Debtor.)	No. 19 C 1978
_____)	
)	
N. Neville Reid, not individually,)	
but solely in his capacity as Chapter 7)	Judge John J. Tharp, Jr.
Trustee for the bankruptcy estate of)	
Michael A. Wolf)	
)	(Bankruptcy Case No. 14 B 27066)
Plaintiff,)	
v.)	
)	
MMQB, Inc., Michael Wolf,)	
Scott Wolf, et al.)	
)	
Defendants.)	

**TRUSTEE’S MOTION FOR LEAVE
TO FILE A BRIEF IN EXCESS OF FIFTEEN PAGES**

Judgment creditor plaintiff, N. Neville Reid, not individually but solely in his capacity as the trustee of the bankruptcy estate of Michael A. Wolf (the “Trustee”), hereby moves the Court for entry of an Order granting him leave to file a brief in excess of fifteen pages. In support thereof, the Trustee states:

1. Local Rule 7.1 provides that “Neither a motion nor brief in support of or in opposition to any motion nor objections to a report and recommendation or order of a magistrate judge or special master, shall exceed 15 pages without prior approval of the court.”

2. By this Motion, the Trustee respectfully requests leave to file a twenty (20) page Reply in Support of his Renewed Motion To Compel Michael Wolf To Turn Over And Deliver Assets And Proceeds Or Alternatively For Entry Of A Judgment Against Him And For Other

Relief (the “Reply In Support Of Renewed Motion For Turnover”).

3. On December 31, 2024 the Trustee filed a Renewed Motion For Turnover. In response to the Trustee’s Renewed Motion For Turnover, Michael Wolf filed both a response to the Trustee’s motion and a motion to dismiss the supplementary proceedings (the additional “Motion To Dismiss”).

4. Michael Wolf’s arguments in his response and his motion overlap.

5. As a result, the Trustee requested leave to file his Reply In Support Of Renewed Motion For Turnover at the same time as his response to Michael Wolf’s Motion To Dismiss.

6. The court granted the Trustee’s request and allowed the Trustee to file his Reply In Support Of Renewed Motion For Turnover and his response to the Motion To Dismiss at the same time in conjunction with each other.

7. Pursuant to local rule, parties are allowed fifteen (15) pages per brief. Therefore, the local rules allowed the Trustee a total of 30 pages for the two briefs.

8. In preparing his briefs in response to Michael Wolf’s two overlapping briefs, it became clear that it would be best to allocate 20 pages to the Trustee’s reply and 10 pages to the Trustee’s response in order to organize the arguments in the most rational manner possible.

9. Therefore, the briefs filed by the Trustee include a twenty (20) page Reply In Support Of Renewed Motion For Turnover and a 10 page response to Michael Wolf’s Motion To Dismiss.

Wherefore, the Trustee respectfully requests the Court to grant him leave to file his Reply in Support of his Renewed Motion For Turnover in excess of fifteen pages, and such additional relief as the Court deems just and appropriate.

Dated: February 13, 2025

Respectfully Submitted,

N. Neville Reid, not individually, but solely
in his capacity as chapter 7 trustee for the
bankruptcy estate of Michael A. Wolf,

/s/ Daniel P. Dawson

One of his attorneys

Daniel P. Dawson (ARDC #6199728)
Nisen & Elliott, LLC
180 N. LaSalle Street, Suite 3600
Chicago, Illinois 60601
(312) 346-7800
ddawson@nisen.com
adrag@nisen.com

CERTIFICATE OF SERVICE

I, Daniel P. Dawson, certify that on February 13, 2025, I caused a copy of the foregoing to be filed electronically through the Court's CM/ECF filing system which will cause the document to be served upon all parties electronically through the Court's CM/ECF filing system, and also served additional parties as listed on the attached Service List as indicated.

/s/ Daniel P. Dawson

Daniel P. Dawson (ARDC #6199728)
Nisen & Elliott, LLC
180 N. LaSalle Street, Suite 3600
Chicago, Illinois 60601
(312) 346-7800
ddawson@nisen.com
adrag@nisen.com

SERVICE LIST

Via ECF Service

U.S. Bankruptcy Court, Clerk	<u>ilnb.appeals@ilnb.usCourts.gov</u>
United States Trustee	<u>pat.s.layng@usdoj.gov</u>
Scott Wolf	<u>scottwolf.0330@gmail.com</u>

Via Federal Express

Michael Wolf
11509 Gramercy Park Ave.
Bradenton, FL 34210-8461